## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA	)
Plaintiff,	)
v.	) No. 4:20-CR-174 SEP/NAB(SRW)
DELEO BARNER	)
Defendant.	)

## MOTION TO MODIFY BOND CONDITIONS TO ALLOW TRAVEL FOR FAMILY GATHERING

Mr. DeLeo Barner, through counsel, respectfully requests a one-time modification of his bond conditions to allow him to travel with his sister to his family's July 4<sup>th</sup> weekend celebration in Springfield, IL in the Central District of Illinois. In support of this motion, he states the following:

- 1. Mr. DeLeo Barner had his initial appearance in federal court on August 30, 2021 (Doc #8);
- 2. On September 14, 2021, the Court denied the Government's detention motion, releasing Mr. Barner on certain conditions (Doc # 21);
- 3. Regarding travel, the Court's Order Setting Conditions of Release restricted Mr. Barner's travel to the Eastern District of Missouri, and initially placed him in the location monitoring program under Home Detention conditions (Doc # 24);
- On January 5, 2022, Mr. Barner requested a modification of his bond conditions to step down his location monitoring from Home Detention to Curfew (Doc # 31);
- 5. The motion was granted the following day, and the Court noted that "(b)oth the Pretrial Services Officer and Government are agreeable to the proposed bond modification" (Doc # 32);

6. Mr. Barner has not incurred a single violation report during his nearly ten months on bond, and

he has made the most of his time on Curfew by obtaining well-paying employment;

7. Mr. Barner has even been permitted to travel for work purposes to the Western District of

Missouri and the Southern District of Illinois since a modification was granted almost two

months ago (Doc # 40) and has incurred no violations since that change was made;

8. Mr. Barner's family is gathering over the July 4<sup>th</sup> holiday weekend at family members' homes in

Springfield, IL;

9. Mr. Barner is respectfully requesting the Court's permission to leave St. Louis by car with his

sister Shirley McPherson on July 2, 2022. They intend to visit Springfield, IL and stay with

family members Calvin Carter at 1808 E. Melrose, Springfield, IL and Darla Twitty at 1546 East

Mason, Springfield, IL. They plan to drive back on the evening of Monday July 4, 2022. Ms.

McPherson is the sister he has been living with during his time on bond in this case;

10. Mr. Barner also requests that he be relieved of his curfew during this travel to allow him the

flexibility to travel freely with his sister while they are in Springfield;

Wherefore Mr. Deleo Barner respectfully requests this Court to modify his bond conditions to allow him

to travel with his sister to his family's July 4th gathering in Springfield, IL.

Respectfully submitted,

/s/Melissa K. Goymerac

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ATTORNEY FOR DEFENDANT

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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the United States Attorney.

/s/Melissa K. Goymerac MELISSA K. GOYMERAC Assistant Federal Public Defender